

WBC

FILED

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

'07 MJ 2282

UNITED STATES OF AMERICA,)

Plaintiff,)

v.)

Jorge Daniel RAMIREZ-Armas)

and)

Veronica QUINTERO-Navarro)

Defendants.)

BY: *[Signature]* Mag. Case Number: _____

COMPLAINT FOR VIOLATION OF

Title 21, U.S.C., Sections 952 and 960
Importation of a Controlled Substance

The undersigned complaint being duly sworn states:

On or about September 20, 2007, within the Southern District of California, Jorge Daniel RAMIREZ-Armas and Veronica QUINTERO-Navarro, did knowingly and intentionally import approximately 7.20 kilograms of methamphetamine, a Schedule II Controlled Substance, into the United States from a place outside thereof; in violation of Title 21, United States Code, Sections 952 and 960.

And the complainant states that this complaint is based on the attached statement of facts, which is incorporated herein by reference.

[Signature]

SIGNATURE OF COMPLAINANT
SPECIAL AGENT
U.S. IMMIGRATION and
& CUSTOMS ENFORCEMENT

SWORN TO BEFORE ME AND SUBSCRIBED IN MY PRESENCE, THIS 21st DAY OF
SEPTEMBER, 2007.

[Signature]
MAGISTRATE JUDGE

PROBABLE CAUSE STATEMENT

On September 20, 2007, at approximately 12:40 p.m., Jorge Daniel RAMIREZ-Armas (RAMIREZ) made application for entry into the U.S. from Mexico at the San Ysidro Port of Entry (POE) driving a blue 2001 Infinity I30 bearing California license plate: US/CA/5VHF940, with Veronica QUINTERO-Navarro as passenger. U.S. Customs and Border Protection (CBP) Officers referred RAMIREZ and QUINTERO with the vehicle to secondary inspection after receiving a positive alert from a Narcotic Detector Dog (NDD). A subsequent CBP border search of the vehicle's gas tank revealed nine (9) packages of a white crystalline substance which weighed approximately 7.20 kilograms. A presumptive field-test of the substance indicated a positive reaction to the presence of methamphetamine.

RAMIREZ was read and waived his constitutional rights under Miranda and admitted that he was to receive approximately \$2000 USD as compensation for transporting the vehicle, containing what he believed to be marijuana, from Mexico into the U.S. and delivering it the yet undetermined destination of either San Jose or Tracy, California.

QUINTERO was read and waived her constitutional rights under Miranda and admitted that she had knowledge of RAMIREZ' arrangement to receive payment of \$2000 USD for transporting the vehicle, containing what she believed to be currency or marijuana, from Mexico into the U.S. and delivering it to Tracy, California.

The vehicle, methamphetamine and cellular phones were retained as evidence. \$442 USD were seized as drug trafficking proceeds. RAMIREZ and QUINTERO were booked into the Metropolitan Correctional Center San Diego pending federal judicial proceedings.